

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF NEW YORK

U.S. EQUAL EMPLOYMENT OPPORTUNITY )	
COMMISSION, )	
)	
Plaintiff, )	Case No. 16-cv-00842-WMS-HBS
)	
)	
v. )	
)	
UPSTATE NIAGARA COOPERATIVE, INC., )	
)	
Defendant. )	
_____ )	

**JOINT MOTION TO APPROVE CONSENT DECREE**

Having engaged in comprehensive settlement negotiations and having agreed that the above-captioned action should be resolved by entry of the proposed consent decree attached to this motion, for the reasons stated therein, Plaintiff United States Equal Employment Opportunity Commission and Defendant Upstate Niagara Cooperative, Inc. jointly move that this Court enter the attached Consent Decree.

WHEREFORE, the parties jointly request that the Court grant the motion.

Respectfully Submitted,

Dated: January 15, 2020

/s/Sebastian Riccardi

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Jadhira Rivera, Senior Trial Attorney  
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U.S. EQUAL EMPLOYMENT  
OPPORTUNITY COMMISSION

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